

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FOUR WOMEN HEALTH SERVICES, LLC,

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY
RESOURCE CENTER INC., d/b/a
ATTLEBORO WOMEN’S HEALTH CENTER,
CATHERINE ROMAN, NICOLE CARGES,
and DARLENE HOWARD,

Defendants.

Civil Action No.: 24-12283

REQUEST FOR ORAL ARGUMENT

PLAINTIFF’S MOTION FOR LIMITED EXPEDITED DISCOVERY

Pursuant to Rule 26(d) of the Federal Rules of Civil Procedure, Plaintiff Four Women Health Services, LLC (“Four Women”) seeks expedited discovery in support of its separate Motion for Preliminary Injunction. As articulated in the memorandum of law in support of that Motion, expedited discovery is not necessary to conclude that an injunction is warranted here. Expedited discovery, however, will provide the Court a fuller record to ensure the efficacy of the injunctive relief it orders and also permit Four Women to take steps to safeguard its patients’ communications and information.

Additionally, given that this matter pertains to a reproductive healthcare provider and its patients, Four Women moves for the Court to enter, pursuant to the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and Local Rule 83.6.11(b), a protective order pertaining to the discovery and use of personal health information.

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Enter an order establishing the limited expedited discovery schedule outlined in Four Women's proposed Order, attached as **Exhibit A** to its Memorandum of Law in Support of its Motion for Limited Expedited Discovery; and
2. Enter Four Women's proposed Protective Order, attached as **Exhibit B** to its Memorandum of Law in Support of its Motion for Limited Expedited Discovery:
 - a. Requiring that all women who have sought and will seek reproductive healthcare services with Four Women be referred to using a pseudonym in public documents, and that patient personal information, such as phone numbers, email addresses, and family member names be redacted with the redacted information provided to opposing counsel; and
 - b. Requiring redactions pursuant to HIPAA for the discovery of individually identifiable health information.

Four Women requests oral argument on this Motion.

DATED: September 5, 2024

Four Women Health Services, LLC,

By its attorneys,

/s/ Matthew Patton

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CERTIFICATE OF SERVICE

I, Matthew Patton, hereby certify that on September 5, 2024, I served the within document on Defendants at the following addresses:

Abundant Hope Pregnancy Resource Center Inc., d/b/a Attleboro Women's Health Center
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/s/ Matthew Patton
Matthew Patton